UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

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MAURICIO PEREZ and GILBERTO MARTINEZ GALVEZ, Individually, On Behalf of All Others Similarly Situated and as Class Representative,

No. 15-CV-6127

Plaintiffs,

-against-

MVNBC CORP. d/b/a BENVENUTO CAFÉ TRIBECA, PERRY MALLAS and WILLIAM MALLAS a/k/a BILLY MALLAS,

-- X

PLAINTIFFS' MOTION TO AMEND

Upon the Affirmation of Steven B. Ross, Esq., dated the 21st day of July, 2016, and annexed exhibits Plaintiffs, Mauricio Perez and Gilberto Martinez Galvez, by their attorneys Ross & Asmar LLC, hereby request, pursuant to the Federal Rules of Civil Procedure 15 and 16, that the Court grant Plaintiffs leave to file an Amended Complaint and join as defendant TKN Corp. The bases for this Motion are set forth in the accompanying Affirmation.

Dated: July 21, 2016
New York, NY

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